



Plaintiffs and Defendant Wal-Mart Stores, Inc. (“Wal-Mart”) file this Joint Motion to Extend Deadlines and Continue Trial Date, seeking a ten-week extension of the discovery deadline set by the Court in its Scheduling Order, Dkt. 61, and an accompanying extension of subsequent case deadlines including a new trial date, as described below. The parties jointly file this motion, and neither party opposes the requested extensions.

The parties seek a ten-week extension of the discovery deadline and the corresponding deadline for dispositive motions in order to accommodate the parties’ ongoing settlement discussions and mediation efforts. The parties undertook a full-day mediation on January 1, 2015 and have scheduled a follow-up mediation on February 24, 2015.

The parties have diligently pursued discovery. The depositions of all the plaintiffs have been taken. The parties have exchanged voluminous written discovery including answers to interrogatories, admissions, and requests for production. Numerous discovery documents have also been exchanged. A relatively brief (ten-week) extension of the discovery cutoff will allow the parties to complete the Rule 30(b)(6) depositions and comply with other previously served discovery requests, and more generally will facilitate an orderly preparation of the issues in this case for both summary resolution and trial.

Specifically, the parties seek to extend the following deadlines:

	Current Deadline (Dkt. 61)	Proposed New Deadline
<b>Completion of Discovery</b>	February 20, 2015	May 1, 2015
<b>Dispositive Motions</b>	March 23, 2015	June 1, 2015
<b>Expert Objections</b>	June 15, 2015	December 23, 2015
<b>Pretrial Disclosures &amp; Objections</b>	June 10, 2015, objections due 14 days thereafter	December 18, 2015
<b>Pretrial Materials</b>	June 25, 2015	January 4, 2016

<b>Exchange of Exhibits</b>	July 6, 2015	January 18, 2016
<b>Trial Date</b>	July 20, 2015	February 2016

The parties' counsel conferred regarding numerous possible trial dates that were earlier than February 2016. However, due to existing conflicts of the parties and counsel between August 2015 and January 2016, the parties respectfully request a February 2016 trial setting. The parties' conflicts between August 2015 and January 2016 include trials currently scheduled in related cases, the end of year retail season which is critical and very busy for Wal-Mart, and trials in other matters for counsels for both parties. Counsel for both parties are fully available for trial throughout the month of February 2016.

The parties believe the schedule proposed above is reasonable and is in the best interest of the parties and the pursuit of timely justice. Because the proposed schedule accommodates both parties' needs, will help facilitate further mediation efforts, will help facilitate orderly discovery, and is offered to promote justice and not for the purpose of delay, the parties jointly request the Court grant the requested extension.

DATE: February 9, 2015

Respectfully submitted,

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**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 7.1, Karl G. Nelson and Hal K. Gillespie, representing the parties to this action, conferred regarding this Joint Motion to Extend Deadlines on February 6, 2015 by electronic mail. The parties have agreed to contents of this motion and the motion is therefore ripe for resolution before this Court.

/s/ Karl G. Nelson  
Karl G. Nelson

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of February 2015, I caused a copy of the foregoing to be served upon all parties of record via the Court's Electronic Filing (ECF) System.

/s/ Karl G. Nelson  
Karl G. Nelson